

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Criminal Case No. 1:18-CR-457 (AJT)
	:	
BIJAN RAFIEKIAN, et al.	:	

**DEFENDANT RAFIEKIAN’S MOTION TO PRECLUDE USE OF
“KICKBACK” AND SYNONYMOUS TERMS**

Defendant Rafiekian, through counsel, hereby respectfully moves to preclude the government from using the term “kickback” and other similar pejorative terms to describe the payments Flynn Intel Group made to Ekim Alptekin and his company, Inovo BV, as referred to in paragraphs 31–38 of the Indictment. The grounds for this motion are set forth in the accompanying memorandum of law. A proposed order is attached to this motion.

Defendant respectfully requests that the Court hear this motion on May 17, 2019, at 9:00 a.m., or at such time as the Court may direct.

Dated: April 26, 2019

Respectfully submitted,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that, on the 26th day of April 2019, true and genuine copies of Defendant's Motion to Preclude Use of "Kickback" and Synonymous Terms was sent via electronic mail by the Court's CM/ECF system to the following:

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